

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
VERMONT MUTUAL INSURANCE COMPANY)	
as subrogee of TIMOTHY D. STEIN and)	Civil Action No.: 05-10307 JLT
WAYNE ROLF)	
)	
Plaintiff)	
v.)	
)	
DAVID'S FLOOR SERVICE, INC.)	
and)	
)	
MIN DANG, d/b/a DAVID'S FLOOR SERVICE)	
Defendants)	
_____)	

MOTION FOR ADMISSION PRO HAC VICE

Now comes the Plaintiff, Vermont Mutual Insurance Company, by its local counsel, Patrick J. Loftus, III, Esquire, of the Law Offices of Patrick Loftus, and hereby moves, pursuant to Local Rule 83.5.3(b), for an order permitting James P. Cullen Jr., Esquire and Joseph F. Rich, Esquire to practice before this Court *Pro Hac Vice* on behalf of the Plaintiff, Vermont Mutual Insurance Company and in support hereof states as follows:

1. James P. Cullen Jr., Esquire and Joseph F. Rich, Esquire of the firm of Cozen & O'Connor, 1900 Market Street, Philadelphia, PA 19103 (telephone (215) 665-2000), is counsel to the Plaintiff Vermont Mutual Insurance Company in this action, and desires the permission of the Court to practice before it. Mr. Cullen is a member in good standing in the Bars of the Commonwealth of Pennsylvania, the State of New Jersey, and the United States District Courts for the Eastern District of Pennsylvania, Middle District of Pennsylvania, and District of New Jersey and Mr. Rich is a member in good standing

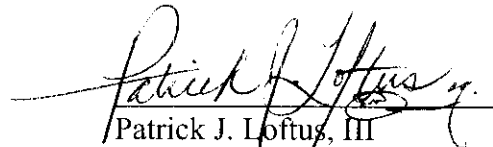
of the Bars of the Commonwealth of Pennsylvania, the State of New Jersey, the District of Columbia, and the United States District Court for the Eastern District of Pennsylvania. There exist no disciplinary proceedings pending against Mr. Cullen or Mr. Rich as a member of the Bar in any jurisdiction where they are admitted to practice. Mr. Cullen and Mr. Rich are familiar with the Local Rules of the United States District Court of the District Court of Massachusetts.

2. The undersigned, a member in good standing of the Bar of this Court, will be associated with Mr. Cullen and Mr. Rich in the prosecution of this action.

WHEREFORE, it is respectfully requested that this Court admit James P. Cullen Jr., Esquire and Joseph F. Rich, Esquire to practice before it on behalf of the Plaintiff, Vermont Mutual Insurance Company.

Respectfully submitted,

By its attorney,

A handwritten signature in black ink, appearing to read "Patrick J. Loftus, III", is written over a horizontal line.

Patrick J. Loftus, III

BBO: 303310

Law Offices of Patrick Loftus

9 Park Street, Suite 500

Boston, MA 02108

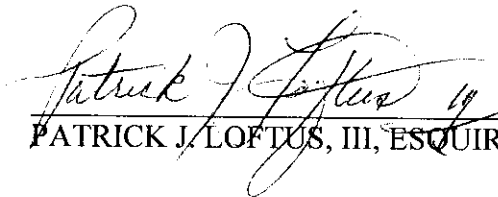
(617) 723-7770

Dated: 4/12/05

CERTIFICATE OF SERVICE

I, PATRICK J. LOFTUS, III, attorney for Plaintiff, do hereby certify that a true and exact copy of the foregoing Motion for Admission of James P. Cullen, Jr., Esquire and Joseph F. Rich, Esquire *Pro Hac Vice* has been served upon counsel by United States Mail, postage pre-paid, this 12 day of April, 2005, as follows:

Susan Johnson Bowen, Esquire
Warren, Hensley, & Bowen, LLP
185 Devonshire Street
Suite 1000
Boston, MA 02110-1410
Attorneys for Defendants


PATRICK J. LOFTUS, III, ESQUIRE.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

VERMONT MUTUAL INSURANCE COMPANY)	CIVIL ACTION
as subrogee of TIMOTHY D. STEIN and)	
WAYNE ROLF)	NO. 05-10307 JLT
Plaintiff,)	
)	
v.)	
)	ORDER ADMITTING
DAVID'S FLOOR SERVICE, INC.)	COUNSEL <i>PRO HAC VICE</i>
and)	
)	
MIN DANG, d/b/a)	
DAVID'S FLOOR SERVICE)	JURY TRIAL DEMANDED
)	
Defendants.)	

THIS MATTER comes before the Court upon the motion to permit James P. Cullen, Jr., Esquire and Joseph F. Rich, Esquire, members in good standing of the Bar of the Commonwealth of Pennsylvania, to conduct proceedings in the above entitled case *Pro Hac Vice*. As it appears from the motion, and any responses thereto, Mr. Cullen and Mr. Rich are duly admitted members, in good standing, of the Bar of the Commonwealth of Pennsylvania, and as good cause exists for the relief sought, and as the Movant has certified that Mr. Cullen and Mr. Rich are ready to proceed, such that the granting of this motion will not delay this action;

IT IS ORDERED this ____ day of _____, 2005, that James P. Cullen, Jr., Esquire and Joseph F. Rich, Esquire be admitted to appear *Pro Hac Vice* in connection with the above entitled case.

BY THE COURT:

J.